

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

(1) Kevin E. Jamison 250-217
(Name of Plaintiff) (Inmate Number)

1181 Paddock Rd. Smyrna, DE. 19977
(Complete Address with zip code)

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(Name of Plaintiff) (Inmate Number)

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: (Case Number)
: (to be assigned by U.S. District Court)

(Complete Address with zip code)

(Each named party must be listed, and all names must be printed or typed. Use additional sheets if needed)

vs. Warden Phelps (Defendant)

(1) Ronnie Moore

(2) Tracy Wilkins

(3) Correctional Medical Services
(Names of Defendants)

(Each named party must be listed, and all names must be printed or typed. Use additional sheets if needed)

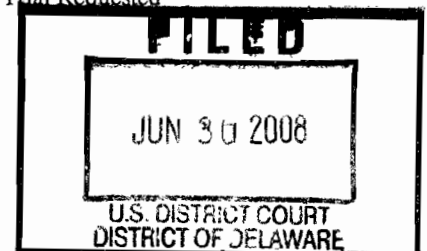
I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

None

CIVIL COMPLAINT

Jury Trial Requested



DO STARTING

Page (1) Continued

(Defendant)

Kevin E Jamison 250217
(Plaintiff)

vs.

(4) Lisa Dangelo Sugar

(5) Louise Desrosiers

(6) Mehdy Zarandy

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? • ☒ Yes • • No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? • • Yes • ☒ No
- C. If your answer to "B" is Yes:

1. What steps did you take? _____

2. What was the result? _____

- D. If your answer to "B" is No, explain why not: I have been denied due process, by grievance board to avoid/delay my filing.

III. DEFENDANTS (in order listed on the caption)

(1) Name of first defendant: Ronnie Moore

Employed as (CMS) Administrator at V.C.C.

Mailing address with zip code: 1181 Paddock Rd. Smyrna, DE.
19977

(2) Name of second defendant: Tracy Wilkins

Employed as Regional Ombudsman at Delaware Regional Office

Mailing address with zip code: 1201 College Park Drive Suite 101
Dover, DE. 19904

(3) Name of third defendant: Correctional Medical Service

Employed as Medical Provider at V.C.C.

Mailing address with zip code: Delaware Regional Office 1201 College
Park Drive Suite 101 Dover, DE. 19904

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

Page (2) Continued

(4) Lisa Dangelo Sugar

Employed as Doctor at V.C.C.

Mailing Address: 1181 Paddock Rd. Smyrna,
DE. 19977

(5) Louise Desrosiers

Employed as Doctor at V.C.C.

Mailing Address: 1181 Paddock Rd. Smyrna,
DE. 19977

(6) Mehdy Zarandy

Employed as Doctor at V.C.C.

Mailing Address: 1181 Paddock Rd. Smyrna,
DE. 19977

Add On

(7) (Warden) Phelps

Employed as Warden at V.C.C.

Mailing Address: 1181 Paddock Rd. Smyrna,
DE. 19977

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. I contacted Ronnie Moore concerning my problems, that I was having concerning my medication. I explained that I was in severe pain, because of a spinal injury and a hernia. He gave me his word that he would help me get the proper medication. (He did nothing)
2. I submitted a grievance complaining about the delayed process, requesting a 3rd tier hearing. Instead, Tracy Wilkins showed up, promising that she would personally make sure that my complaints were taken care of. (Never recieved any Pain meds) suffered after surgery.
3. From 2006 - 2008 off + on I suffered, because the Medical Providers here at V.C.C. neglected to take my medical conditions serious. After countless pleas for some assistance and numerous grievances, I'm still being denied the appropriate treatment.

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I want the Court to award me monetary damages for: Medical Negligence, Pain and Suffering, and cruel and ~~unusual~~ unusual punishment. I'm asking for \$1,000,000

(4),(5),(6) I've seen Dr. Lisa Dangelo Sugar, Dr. Louise Desrosiers, and Dr. Mehdy Zarandy with no resolve. They've all refused me the medication I need for pain, before and after surgery. They've all viewed my medical file, and concur that both of my injuries are valid. After surgery on 5/24/08 I was rushed to the emergency room, (I asked) but no one knows why. After being returned to V.C.C on 5/31/08, the pain was severe and again I was sent to the emergency room on 5/31/08. 6/10/08 I was released from the infirmary, and returned to my housing unit. As of 6/10/08 again my pain meds were cut off, even after complaining of severe pain. I followed procedure and put in a sick-call slip, when I seen Dr. Desrosiers at the appointment she refused to renew my pain meds.

(7) The Warden's only response is that he has no control over medical.

2. I ask that the Court order a thorough
investigation, into the medical treatment or the
lack thereof of the Correctional Medical Services
staff. (This is the head of the problem)

3. I would like to ask that the court order
Correctional Medical Services, to hire only
certified [REDACTED] Doctors. There have been too
many late diagnosis on terminal illnesses, and
some have died as a result of it.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 25th day of June, 2008.

Kevin E. Jamison

(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)

Certificate of Service

I, Kevin E. Jamison, hereby certify that I have served a true
and correct copy(ies) of the attached: _____

_____ upon the following
parties/person (s):

TO: (Warden) Phelps
Vaughn Correctional Center
1181 Paddock Rd.
Smyrna, DE. 19977

TO: Bonnie Moore
Vaughn Correctional Center
1181 Paddock Rd.
Smyrna, DE. 19977

TO: Tracy Wilkins
Delaware Regional Office
1201 College Park Dr. Suite 101
Dover, DE. 19904

TO: Correctional Medical Services
Delaware Regional Office
1201 College Park Dr. Suite 101
Dover, DE. 19904

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 25th day of June, 2008

To: Lisa Dangelo Sugar
Vaughn Correctional Center
1181 Paddock Rd.
Smyrna, DE. 19977

To: Louise Desrosiers
Vaughn Correctional Center
1181 Paddock Rd.
Smyrna, DE. 19977

To: Mehdy Zarandy
Vaughn Correctional Center
1181 Paddock Rd.
Smyrna, DE. 19977

FM: Kevin E. Jamison
SBI# 250217 UNIT (23) A-4-7
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

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(Clerk) U.S. District Court
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844 N. King St.
Wilm, DE. 19801

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